

FROM

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Remarks

This Amendment is responsive to the September 13, 2007 Office Action. Reexamination and reconsideration of claims 1-36 and 38-54, is respectfully requested.

Summary of The Office Action

Claims 1, 3-9, 21, 23-27, 29-36, 38-43 and 47 were rejected under 35 U.S.C. §102(b) as being anticipated by Schibeman et al. (US 6,659,581 B2).

Claims 2, 22, and 28 were rejected under 35 U.S.C. §103(a) as being unpatentable over Schibeman et al. In view of Axtell et al. (US 2002/0060722 A1).

Claims 10-20 and 44-46 were rejected under 35 U.S.C. §103(a) as being unpatentable over Schibeman et al. In view of Cleland et al. (US 6,491,377 B1).

The Claims Patentability Disclaimers Over the References of Record

Claims 1, 3-9, 21, 23-27, 29-36, 38-43 and 47 were rejected under 35 U.S.C. §102(b) as being anticipated by Schloeman et al. (US 6,659,581 B2).

35 U.S.C. §102

For a 35 U.S.C. §102 reference to anticipate a claim, the reference must teach every element of the claim. Section 2133 of the MPEP recites:

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Independent Claim 1

Claim 1 was rejected under 35 U.S.C. §102 as being anticipated by Schloeman. Applicant respectfully submits that Schloeman does not anticipate claim 1. Claim 1, lines 6-8 recite, "a first address generator configured to provide first address signals; a second address generator configured to provide second address signals." The Office Action states, on page 2, that the first and second address generators of claim 1 are taught by elements 110a-110n of Schloeman.

Elements 110a-110n are pulse width registers where each register stores a pulse width value that controls the width of a fire pulse. The pulse width registers do not generate addresses. Schloeman describes the registers as follows:

Pulse width registers 110a-110n store pulse width values which are employed to determine the widths of the fire pulses provided from fire pulse generator circuitry 100. Pulse width registers 110a-110n respectively provide pulse counts 1, 2, . . . , N on busses 110a, 110b, . . . , 110n, which represent the corresponding pulse width values stored in pulse width registers 110a-110n. Each pulse width register 110a-110n stores an appropriate number of bits in the pulse width value to properly

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encode the desired width of the corresponding fire pulse from fire pulse generator circuitry 100.

(Schloeman, col. 8, lines 18-28)

Thus, the output from a pulse width register 110a is a pulse width value. The output is provided as "pulse count 1" on bus 116a. The pulse count is a value to control the desired width of a fire pulse. The pulse count is not an address. Therefore, pulse width registers 110a-110n are not address generators and do not teach the recited first and second address generators recited in claim 1. As such, Schloeman fails to anticipate each and every element of claim 1 and fails to establish a prima facie anticipation rejection. The rejection should be withdrawn.

Although Schloeman shows in figure 4 that an address bus 114 is connected to the pulse width registers 110a-110n, there is no teaching that addresses are generated by the pulse width registers 110a-110n or even outputted. Therefore, the pulse width registers 110a-110n do not read on the claimed address generators.

The Office Action cites to figure 4, elements 116a and 118n with regard to the claimed first and second drop generators that eject fluid. Elements 118a and 118n are identified as "fire pulse generators" 1-N. The fire pulse generators "provide the fire signals" on the fire pulse lines 120a-120n (col. 8, lines 37-40). The fire pulse signals on lines 120 "control the ejection of ink drops from nozzles of printhead 40." (col. 9, lines 21-23). Therefore, elements 116a-118n do not eject ink and thus do not teach the drop generators that eject fluid as claimed. Schloeman fails to anticipate claim 1.

For these reasons, Schloeman fails to teach every element of claim 1 and the rejection should be withdrawn. Accordingly, As such, dependent claims 2-20 also are not taught or suggested by the reference and patentably distinguish over the references.

Independent Claim 21

The Office Action on page 4 cites Schloemann figure 4, elements 110a and 110n as teaching the recited means for generating first address signals and means for generating second address signals. Based on the explanation of Schloemann under claim 1, elements 110a-110n do not teach address generators and thus claim 21 is not anticipated. The rejection should be withdrawn.

Independent Claim 20 and 43

Similarly, the Office Action cites elements 110a and 110n as teaching the claimed elements relating to generating first and second address signals. Elements 110a and 110n (pulse width registers) do not generate addresses and thus do not anticipate either claim. The rejections should be withdrawn.

Independent Claim 35 and 39

Claims 35 and 39 recite a first source of address signals and a second source of address signals. The pulse width registers 110a-110n were cited to teach the claimed elements. However as shown above, they do not. The rejection should be withdrawn.

The §103 Rejections

All the §103 rejections were based on the primary reference of Schloemann. It has been shown that Schloemann fails to support the rejection for which it is relied upon. Thus Schloemann fails to establish a *prima facie* obviousness rejection even when combined with other references. The §103 rejections are improper and should be withdrawn.

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For the reasons set forth above, claims 1-36 and 38-43 patentably and unobviously distinguish over the references and are allowable. An early allowance of all claims is earnestly solicited.

Respectfully submitted,



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Conclusion